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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC
23 MDL No. 1917

24 This Document Relates to:

25 *The Indirect Purchaser Action*

26 **DECLARATION OF AYA KOBORI IN**
27 **SUPPORT OF THE TOSHIBA**
28 **DEFENDANTS' ADMINISTRATIVE**
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)

DECLARATION OF AYA KOBORI IN SUPPORT OF
THE TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC
MDL No. 1917

1 I, Aya Kobori, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, attorneys for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information
4 Systems, Inc., Toshiba America Consumer Products, LLC, and Toshiba America Electronic
5 Components, Inc. (collectively, the “Toshiba Defendants”). I make this declaration in
6 support of the Toshiba Defendants’ Administrative Motion to File Documents Under Seal
7 Pursuant to Civil Local Rules 7-11 and 79-5(d) (the “Motion to Seal”).

8 2. Except for those matters stated on information and belief, which I believe to be
9 true, I have personal knowledge of the facts set forth herein and, if called upon, could and
10 would competently testify thereto under oath.

11 3. On June 18, 2008, the Court approved a Stipulated Protective Order (Dkt. No.
12 306) in this matter.

13 4. The Toshiba Defendants and other parties to this litigation have produced in
14 this action certain documents and information designated as either “Confidential” or “Highly
15 Confidential” pursuant to the Stipulated Protective Order.

16 5. On February 27, 2015, the Toshiba Defendants filed an administrative motion
17 to seal the following materials pursuant to Civil Local Rules 7-11 and 79-5(d):

18 a. Exhibit A to the Lau Declaration, which is the Rebuttal Expert Report of
19 Janet S. Netz, Ph.D., dated September 26, 2014, that the IPPs have
20 previously submitted under seal because it contains information designated
21 “Confidential” and/or “Highly Confidential” under the Stipulated
22 Protective Order.

23 6. Pursuant to Civil Local Rules 7-11 and 79-5(d), this Court’s General Order
24 No. 62, Electronic Filing of Documents Under Seal, effective May 10, 2010, and the
25 Protective Order, Exhibit A to the Lau Declaration should be maintained under seal pending
26 further supporting declarations from the designating parties. Under the Stipulated Protected
27 Order, it is the burden of the parties designating those exhibits as “Confidential” or “Highly
28 Confidential” to demonstrate that those materials should remain under seal.

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1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct.

3 Executed this 27th day of February, 2015, in New York, NY.

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7 _____
8 Aya Kobori
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CERTIFICATE OF SERVICE

On February 13, 2015, I caused a copy of “DECLARATION OF AYA KOBORI IN SUPPORT OF THE TOSHIBA DEFENDANTS’ ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)” to be electronically filed via the Court’s Electronic Case Filing System, which constitutes service in this action pursuant to the Court’s order of September 29, 2008.



Lucius B. Lau

White & Case LLP
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Washington, DC 20005

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